U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Orange County Metal Processing - Removal Polrep
Final Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IX

Subject: **POLREP #6**
Final POLREP
Orange County Metal Processing
A955
Fullerton, CA

To: Harry Allen, EPA Region 9
Kathleen Salyer, EPA

From: Craig Benson, On-Scene Coordinator
Date: 8/28/2014
Reporting Period: 7/19/14 - 8/22/14

1. Introduction

1.1 Background

Site Number:	A955	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	4/29/2014
Response Authority:	CERCLA	**Response Type:**	PRP Oversight
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	6/3/2014	**Start Date:**	6/3/2014
Demob Date:	8/22/2014	**Completion Date:**	8/22/2014
CERCLIS ID:	A955	**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

Time-Critical PRP Removal Action

1.1.2 Site Description

Orange County Metal Processing (OCMP) is an abandoned metal zinc plating and anodizing business that processed parts for the automobile and computer industries. The company conducted business from approximately 1980 until 2011 at one parcel in a light industrial area of Fullerton, Orange County, California. Previous metal plating operations are believed to have been conducted at the site beginning in the 1960s.

The primary constituents of concern at OCMP include sludge's and solutions bearing cyanide, chromium, copper and zinc, and acidic and caustic compounds. The Orange County Health Care Agency (OCHCA) requested EPA's assistance with the Site on March 12, 2014.

1.1.2.1 Location

OCMP is located in a mixed commercial and industrial area at 1711 E. Kimberly Avenue, Fullerton, California in the east portion of the city of Fullerton (Latitude: 33.8638° Longitude: -117.8961°) The Site is located on the western portion (approximately 0.3 acres) of Assessor's Parcel Number (APN) 033-270-30. The larger central and eastern portion of the parcel housed the former PCA Metal Finishing, Inc. business with an address of 1726 East Rosslyn Avenue.

A stormwater channel, railroad track, Kimberly Avenue, and commercial and industrial businesses are located to the south of the Site. Rosslyn Avenue and commercial/industrial businesses are located north of the Site. The Santa Ana River, the primary surface water drainage feature in the area, is located approximately 2.5 miles east and southeast of the site.

1.1.2.2 Description of Threat

See POLREP #1

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

See POLREP #1

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

See POLREPS 1 thru 5 for activities occurring 6/3/14 thru 7/18/14.

7/21/14 – 7/25/14

No on-site activity. Awaiting concrete and soil laboratory data from the secondary containment pits sampling effort. The sampling was conducted in accordance with the 7/16/14 Addendum to Waste Removal Plan that was approved by EPA on 7/17/14 (see POLREP 5).

7/28/14 – 8/8/14

The PRP contractor (DUDEK) presented the sampling results in a memorandum dated 7/30/14 and in a follow-up memorandum dated 8/4/14. Concrete and shallow soil samples were collected from 11 locations from the north and south secondary containment pits. The concrete core samples were crushed and homogenized by the laboratory prior to analysis for total metals, pH and cyanide. The only metal constituent detected in the concrete samples at a concentration greater than the State Total Threshold Limit Concentration (TTLC) was cadmium (3 samples ranging from 122 mg/kg to 258 mg/kg). Cyanide was detected in all of the concrete samples in the range of 3.3 mg/kg to 160 mg/kg.

Soil samples collected at 0.5 feet below the base of the concrete were also analyzed for total metals, pH and cyanide. The only metal constituent detected in the 0.5 foot soil samples at a concentration greater than the TTLC was cadmium (4 samples ranging from 166 mg/kg to 1,930 mg/kg). Cyanide was detected in all of the 0.5 foot soil samples in the range of 0.53 mg.kg 380 mg/kg.

Four soil samples collected at 2.0 feet below the base of the concrete were also analyzed for total metals and cyanide (corresponding to higher 0.5 foot cadmium results). The metals concentrations in the 2 foot samples were all below TTLC values. Comparison of the cadmium concentrations from the 0.5 foot and 2 foot samples indicates that the concentrations decrease by approximately 89% to 98% in the deeper samples. Cyanide concentrations also decreased in the 2 foot samples (all under 100 mg/kg).

On 8/1/14, the PRP formally requested an extension of time to 8/29/14 to complete the removal action per the terms of UAO paragraph 58. OSC Benson granted the extension on 8/4/14.

On 8/1/14, three manifested loads were transported off-site (see 2.1.4 Progress Metrics). These loads represented remaining RCRA hazardous waste residues from the plating pits (15 tons); non-RCRA debris and concrete from the plating pits (15 tons); and a small volume of decontamination water from the 7/17/14 sampling effort.

8/11/14 – 8/22/14

On 8/11/14 through 8/13/14, DUDEK subcontractor Barber-Webb Co. installed 60 mil. fused panel HDPE liners in both the north and south plating pits. Temporary liner installation was requested by DTSC as a control to minimize rainwater contact/percolation through the pits in the period after the removal action while DTSC lead subsurface investigation and remediation efforts continue.

On 8/14/14, OSC Benson performed a final site walk with Orange County Health Care Agency (OCHCA) representative Kevin Baitx. Liner installations were complete and all hazardous wastes (1 exception) were removed from the property.

On 8/22/14, the final manifested load of hazardous waste was transported off-site (see 2.1.4 Progress Metrics). This represented a single drum of PPE and concrete.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Three PRPs received CERCLA General Notice Letters and a CERCLA UAO. The property ownership trust was a responsive PRP and is met the terms of the UAO. All phases of the removal were approved and overseen by EPA.

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Facility*	*Date*
Hazardous Waste Liquid, N.O.S. (D007, D005)	Liquids	4,600 gals.	013102317JJK	Evoqua	6/16/14
Hazardous Waste Liquid, N.O.S. (D007, D005)	Liquids	1,250 gals.	013102316JJK	Evoqua	6/17/14
Waste Cyanide Solutions, N.O.S. (D007, F007)	Liquids	1,500 gals.	013102450JJK	US Ecology	6/25/14
Waste Corrosive Liquid, Acidic, Inorganic, N.O.S. (D002, D007, D005)	Liquids	1,925 gals.	013102446JJK	US Ecology	6/25/14
Hazardous Waste Solid, N.O.S. (D003, D005, D007, F008)	Solids	32,500 lbs.	013265318JJK	US Ecology	6/30/14
Waste Oxidizing Liquid,					

Corrosive, N.O.S. (D001, D002, D007, D010, D011)	Liquids	275 gals.	013265310JJK	Evoqua	6/30/14
Hazardous Waste Solid, N.O.S. (D007, D005)	Solids	70 cubic yards	013265324JJK	US Ecology	6/30/14
Hazardous Waste Solid, N.O.S. (D003, D005, D007, F008)	Solids	1,000 lbs.	013265352JJK	US Ecology	7/1/14
Hazardous Waste Solid, N.O.S. (D007, D005)	Solids	70 cubic yards	013265321JJK	US Ecology	7/1/14
Hazardous Waste Liquid N.O.S. (D007, D005)	Liquids	250 gals.	013265071JJK	Evoqua	7/18/14
Various Lab Packs - flamm. corr., oxidizing, toxic	Liquids	530 lbs.	013265072JJK	Crosby & Overton	7/18/14
Varoius bulked drums - aerosols, hypochlorite, etc.	Liquids	200 gals.	013265074JJK	Crosby & Overton	7/18/14
Hazardous Waste Solid, N.O.S. (D007, D005)	Solids	25 cubic yards	013265266JJK	US Ecology	7/18/14
Waste Corrosive Solid, Basic, Inorganic, N.O.S. (D007)	Solids	25 cubic yards	013265264JJK	US Ecology	7/18/14
Waste Corrosive Liquids and Solids, N.O.S. and Non-RCRA Hazardous Waste Liquids	Solids Liquids	4,500 lbs. 805 gals.	013265251JJK	US Ecology	7/18/14
Waste Oxidizing Solid, Corrosive, N.O.S. (D001, D007)	Liquids	55 gals.	013265262JJK	US Ecology	7/18/14
Hazardous Waste Liquid N.O.S. (D006)	Liquids	10 gals.	007622890FLE	US Ecology	8/1/14
Hazardous Waste Solid N.O.S. (D006, D007, D008)	Solids	15 tons	012891665JJK	US Ecology	8/1/14
Non RCRA Hazardous Waste Solid	Solids	15 tons	012891663JJK	US Ecology	8/1/14
Non RCRA Hazardous Waste Solid	Solids	250 lbs.	007625893FLE	US Ecology	8/22/14

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

2.2.1.2 Next Steps

Await final PRP contractor report.

2.2.2 Issues

On 7/14/14, OSC Benson held an on-site meeting with the PRP, PRP representatives (council and contractors), the DTSC Cleanup Program Project Manager and DTSC contractors, and the Orange County Health Care Agency (OCHCA) representative. The purpose of the meeting was to discuss the post-removal disposition of the site once the above-ground hazardous waste management terms of the EPA UAO were met and provide awareness to the stakeholder agencies with follow-up site responsibilities (i.e., on-going DTSC subsurface remediation program, property transfer, etc.). Counsel for the property owner agreed that the removal action was a first step in an on-going effort to prepare the site for a "responsible transfer" of the property, which will include additional subsurface investigative effort under local agency and DTSC control. Numerous limited subsurface environmental investigations have been conducted at OCMP and adjoining former PCA property since 1990. In 2007, DTSC conducted a Phase I Environmental Assessment Verification of the OCMP property. Results of this Phase 1 Verification suggested that volatile organic compounds (VOCs) tetrachloroethylene (PCE) and trichloroethylene (TCE) were potential constituents of concern in soil gas and in groundwater at/around the property. DTSC began using State Orphan Funds (Hazardous Substances Cleanup Account) to further investigate and eventually begin subsurface remediation at the Site.

A soil, soil vapor, and groundwater investigation was conducted by DTSC's Brownfield and Environmental Restoration Program (Cleanup Program) in 2012 to identify the areas where VOCs were present in the subsurface and to get a general understanding of groundwater contamination levels Soil gas and groundwater sample results confirmed that PCE and TCE are the primary VOCs present however, a source area for the VOCs was not identified and the lateral and vertical extent of VOCs was not delineated based on the data obtained. Concentrations of metals in groundwater and soil samples were within the background ranges and did not indicate metal impacts to soil or groundwater from site operations.

DTSC's effort ultimately resulted in the installation of a Soil Vapor Extraction (SVE) system that encompasses both the former PCA facility and OCMP property. The SVE system has been operated intermittently by DTSC since May 2012. In the meantime, DTSC has conducted additional investigation at the PCA facility and has also brought on additional extraction wells to feed into the SVE system. The aboveground components of the SVE system involve a trailer mounted high vacuum blower staged near the south anodizing line and piping runs from extraction wells to a knockout tank and dual 2000 pound vapor phase granular activated carbon vessels connected in series in proximity to the wastewater treatment system.

According to the DTSC Cleanup Program Project Managers, from this point forward, PCA and OCMP will be considered as one large site for subsurface cleanup purposes due to the location of the plume. Currently, there is a groundwater pilot test being evaluated by DTSC to assess the feasibility of implementing a groundwater remedy at the site. There are already plans to expand the SVE system to accommodate areas where the radius of influence for extraction is not reachable.

The DTSC sponsored subsurface investigation and remediation effort is an area wide effort and is not necessarily related to past or on-going practices at the OCMP. It is summarized here as the above ground features of the SVE system and the numerous groundwater monitoring, soil vapor and soil boring installations are key characteristics of the site today. In addition, the DTSC ISE and use of State Orphan Funds is intended only for subsurface remediation issues.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

No information available at this time.

4. Personnel On Site

No information available at this time.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.